Day Care Parent
Working Advisory Committee

Review of the Day Care
Licensing Policy Manual

July 1992

92-07397/

The Day Care Parents Working Advisory Committee

July 15, 1992

The Honourable John Oldring
Minister of Family and Social Services
Province of Alberta
104 Legislature Building
Edmonton, Alberta
T5K 2B6

Dear Mr. Oldring:

It is our honour and privilege to submit to you the final report of our review of the Day Care Licensing Policy Manual.

Our review of the policy manual has been exhaustive with each policy addressed as an individual item and then examined from our perspective as parents. We believe that our recommendations about the policy manual fairly reflect what average Alberta parents would wish as standards of operation for Day Care Centres in Alberta. We have weighed the issues and the impact of our recommendations and are confident that they are fair to *all* people involved in day care services, from the profit and not-for-profit operators, the staff, the parent and most important for the children of Alberta.

Children are Alberta's most precious resource. It is with all of the children of Alberta in mind that we have prepared our recommendations.

We would like to thank you for the opportunity of working on such a dynamic and useful Committee of parents.

Respectfully submitted.

Martin Halliday, Chairman

Judi McCaustlin, Vice Chairman

Stan J. Backs

Doug Christie

James T.N. Craig

Donna L. Grimes

Valerie Phillips

Kathy Samson

Sharon Schentag

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1.0 INTRODUCTION

The Alberta Day Care Regulation (333/90) was introduced in December 1990, therefore requiring the need to prepare a new licensing policy manual in support of the Regulation. A draft of the Day Care Licensing Policy Manual was developed and distributed to key stakeholder groups in Alberta to allow them an opportunity to respond and provide their feedback. Prior to the introduction of the 1990 policy manual, the 1987 policy manual was in place and is still in effect until the 1990 manual has received full approval.

Initial distribution of the new policy manual was the first step in a public consultation process about the policies carried therein.

The second step in that consultation process involved establishing a Day Care Parent Working Advisory Committee to review the policy manual from a parent's perspective.

This report provides the formal feedback about the policy manual, from the Day Care Parent Advisory Working Committee (the Committee), to the Minister of Family and Social Services, the Honourable John Oldring.

1.1 About the Committee

A public call to parents of children being cared for at day care centres (D.C.C.) was issued in November of 1991 requesting parents to express their interest in participating on a Parent Advisory Committee. Nine people were chosen for the Committee.

The following Table (One) provides the names of the Committee members and some of the demographic variables.

TABLE ONE
DAY CARE PARENT WORKING ADVISORY COMMITTEE
DEMOGRAPHICS

Name	Location	Rural	Urban	Private	Non-Profit	Licensed Spaces in D.C.C.
Martin Halliday	Calgary		*		*	80
Judi McCaustlin	Grande Prairie		*		*	80
Stan J. Backs	St. Albert		*	*		43
Doug Christie	Fort McLeod	*			*	32
James T.N. Craig	Wainright	*			*	60
Donna L. Grimes	Airdrie		*	*		64
Valerie Phillips	Edmonton		*	*		60
Kathy Samson	Trochu	*		*		29
Sharon Schentag	Medicine Hat		*	*		21

1.2 Terms of Reference for the Committee

The following are the Terms of Reference for the Committee as approved by the Minister's Office.

2. Purpose/Objectives

2.1 To establish a parent advisory working Committee that will make recommendations to the Minister based on a review of the draft policy manual and the feedback from various stakeholder groups.

2.2 To provide parents with an opportunity to actively voice their issues, concerns and preferences regarding care for their children.

2.3 To actively involve parents in the process of sharing the responsibility for the care of their children outside the home.

3. Scope of the Parent Advisory Working Committee

3.1 The Committee will review documents relevant to the Day Care Licensing Policy Manual.

3.2 It will address and analyze recommendations contained in the feedback documents from stakeholder groups that will impact on day care for their children.

3.3 The Committee may, at its discretion, request further information from stakeholder groups, or request other information as required to assist in their work.

3.4 The Committee will respect the confidentiality of all consultation feedback documents submitted by stakeholder groups.

3.5 The Committee will advise the Minister on recommendations for future policy direction in the new licensing policy manual.

1.3 About the Committee Process

The Committee met over three months in early 1992. Presentations were made to the Committee by representatives of the Day Care Program, namely Dennis Maier and Lora Lea Gaboriau; by Shannon Eaton and John Samaska of the Day Care Society of Alberta; and by Avril Pike and Sandy Snow of the Canadian Day Care Advocacy Association and the Edmonton Coalition for Quality Day Care respectively.

All submissions made to the Minister by stakeholders and interested individuals during the first step in the public consultation were also reviewed by the Committee.

2.0 POLICY REVIEW AND RECOMMENDATIONS

The task of the Committee was to review the Day Care Licensing Policy Manual from a parent perspective. The following report provides a synopsis of recommendations, a listing of Committee's recommendations, and its conclusions.

2.1 Synopsis of the Recommendations

- **Complaint Investigation (Section 6 of the Act)**

One issue brought to the attention of the Committee dealt with complaint investigations of day care centres by Licensing Officers of the Department. Such investigations are conducted when the Department is notified of a concern from the public. The Committee felt that Licensing Officers should maintain their ability to investigate to ensure standards are being met. The Committee recommends that where a complaint has been made in writing to the Department, the complainant should be notified in writing whether or not the complaint was verified and that the appropriate action was taken. In addition, information about non-compliances should be made available to parents upon request.

- **Sales of Day Cares (Section 1 of the Regulation)**

While the Committee can understand the need for three months notice for the Department to conduct a number of logistical activities related to the sale of a D.C.C., it felt that one month's notice was deemed reasonable.

The Committee also believes that most D.C.C. owners would know at least one month in advance that the sale of a D.C.C. is pending, therefore, the Committee felt this recommendation to be realistic.

- **Service Plans (Section 5 of the Regulation)**

The Committee discussed the importance of service plans extensively and concluded that in order to determine a D.C.C.'s ability to provide a safe and effective child care program, a service plan is *essential*. The policy manual routinely refers to the service plan as a guideline for D.C.C. operations. If all D.C.C.'s had a service plan the system would operate on a "level playing field."

It was therefore the recommendation of the Committee that all D.C.C.'s have a service plan. Those that do not should be given a reasonable period of time to develop a plan.

- **Criminal Record Checks (Section 5 of the Regulation)**

The issue of criminal record checks was discussed on a number of occasions and the Committee determined a criminal record check is a very important part of the hiring process. Children are vulnerable and should not be under the care of a person who has a criminal record. The Committee considered that possibly *all* current staff should have checks, then realized that this would be impractical. The Committee, therefore, recommends and supports the policy manual that all staff and new owners be subject to a criminal record check prior to their work in a D.C.C.

- **Measurement of Net Floor Area (Section 11 of the Regulation)**

The Committee agreed with retaining the measurement of net floor area as proposed in the policy manual. The areas not to be included in the calculation are hallways, washrooms, stairwells, offices, lockers, storage and staff facilities. This will ensure that children have sufficient space as per existing industry standards. Those D.C.C.'s which were grandfathered will not be affected by the new policy. The Committee also recommends that parents (as customers) do have the right to know the net floor area per child for a specific D.C.C. The Committee felt this type of information should be included in a "Parents Handbook", which was envisioned as a responsibility of the day care industry not Alberta Family and Social Services.

- **Meeting Children's Developmental Needs (Section 14 of the Regulation)**

The Committee reviewed the policy regarding meeting the developmental needs of children and were impressed by its comprehensiveness. Discussion indicated the importance of adequately qualified staff who will ensure that the developmental needs of children are met.

Some refinements to the actual policy text are recommended by the Committee.

- **Discipline (Section 15 of the Regulation)**

After a lengthy discussion regarding the policy on discipline, the Committee considered the importance of recognizing that corporal punishment had not been specifically excluded in the policy manual. The Committee believes that corporal punishment is unacceptable in a D.C.C. and strongly recommends policy which states that corporal punishment must not be used to discipline or punish children.

- **Meals and Snacks (Section 25 of the Regulation)**

The Committee felt that although the Day Care Nutrition and Food Service Manual, as the recommended standard for meals and snacks, is a useful source of information and has lots of good ideas, it is far too directive in its expectations of operators. Therefore, the Committee recommends the use of Canada's Food Guide as the basis of policy. The Day Care Nutrition and Food Service Manual should be made available to all operators as a resource.

- **Staff Training (Section 34 of the Regulation)**

As parents, the Committee welcomes the new requirements for staff qualifications. To allow day care operators some flexibility in staffing arrangements, the Committee recommends that "same level" substitution for fifteen minute breaks and lunch not be necessary. Further, the Committee supports the staff qualification and phase-in periods as recommended in the policy.

- **Staff:Child Ratios (Section 35 of the Regulation)**

The Committee's primary concern (as parents) is the welfare of children, and therefore the Committee could not support any exemptions to the staff:child ratio policies which could compromise the safety, health, or happiness of children in day care. Consequently, the Committee strongly supports the required minimum standards regarding staff:child ratios and does not support global ratios. Mixed age groupings for children of similar ages are acceptable providing they are outlined in a D.C.C.'s service plan. In addition, the Committee recommends that during sleep times and other designated activities, the relaxed ratios must not compromise the safety of the children in an emergency; therefore, sufficient staff must remain on the premises.

Further, the Committee sees the necessity for flexibility in designating consistent primary staff members for the care of each child and feels that any additional costs of these recommendations are minimal and well worth the safety of children.

- **Adequate Supervision (Section 40 of the Regulation)**

The Committee recommended that the staff:child ratio remain in effect throughout the working day. This recommendation was made to assure the health and safety of the children and staff in the event of an emergency situation which requires at least full staff:child ratio. Contravention of the staff:child ratio (on-site) could seriously compromise safety of the children. This is unacceptable.

2.2 Recommendations

The following section of the report comprises the technical and specific recommendations made by the Committee regarding individual policies. All policies in the draft manual were reviewed; those policies not specifically mentioned in this section were recommended for approval, as is, by the Committee.

Section 6 (Act)

Subject	**Complaint Investigation**
Reference	Act - s.6(1) Regulation - N/A Draft Policy Manual: DL-01-06-01
Policy	Policy outlining Licensing Officers' authority to investigate complaints.
Discussion	The Committee agreed that a Licensing Officer's ability to investigate is essential providing there is a justified complaint. However, with respect to complaints that have been lodged against a D.C.C., the anonymity of those voicing the concern must be maintained. Copies of non compliance and Section 7 forms should be available at the day care for parental viewing if requested.
Recommendation	Adopt the following "that where a complaint has been made in writing, the complainant will be notified in writing whether or not the complaint was verified and that appropriate action has been taken."
Additional Comment	Should parents request information about non-compliances at a day care centre, the information should be made available to parents (that is the information is available but not posted).

Section 3 (Act)

Subject	**Authority for Duties**
Reference	Act - s.3(1)-(2) & s.6 Regulation N/A Draft Policy Manual: DL 01-03-01 DL 01-06-01
Policy	Policy specifying Licensing Officers' authority to recommend a D.C.C. be licensed, and supervisors delegated authority to approve or refuse to approve issuance of a license.
Discussion	The Committee examined the policy relative to the authority that a Licensing Officer has to investigate complaints and felt that the line of authority is very necessary, and indeed there may be need for more than one Licensing Officer for a given situation. Since there is a formal appeal process and the Licensing Officer only recommends approval of a License, the Committee believe the line of authority is fair. Discussion included the consideration that a person posing as a Licensing Officer could enter a D.C.C. since specific Licensing Officer identification is not used. The Committee felt that this could cause a breach in security at a D.C.C. and should be addressed.
Recommendation	Retain policy in the policy manual as is.
Additional Comment	A policy requiring that Licensing Officers wear a photo identification badge while visiting D.C.C. should be implemented.

Section 7 (Act)

Subject	**Orders After Inspection (Section 7's)**
Reference	Act - s.7 Regulation - N/A Draft Policy Manual: DL-01-07-01
Policy	Policy specifying when an Order After Inspection (Section 7) may be issued and the possible actions taken before issuance of a Section 7 (e.g., issuance of Notice of Deficiency).
Discussion	This policy specifies when an "Order After Inspection" may be issued and the possible actions taken before issuance of a Section 7. Enforcement of day care regulations brought forth many examples from the Committee, however, there was a realization that an inspection order or deficiency notice does not necessarily mean children are at risk. There appeared to the Committee to be a lack of communication between the Licensing Officer, day care operators and parents. From the parent perspective, it is important to ensure that risks and hazards are minimized or eliminated through actions by the Licensing Officer in concert with the operator. The Committee agreed information on Section 7 orders for a respective day care is not required for parental viewing; however, it was felt that this information should be available if requested by parents from the respective D.C.C. This policy generated discussion about numerous situations and to accurately understand the Committee used an example. In one day care centre in the 6 month to 18 month room, cribs should be placed with at least 2 feet around all sides. The cribs are now placed longitudinally. The director argued that this was the most efficient use of space and the Licensing Officer agreed. The Committee agreed that the policy should be retained and also felt that the Section 7 process should be explained to parents in a parents' handbook. For situations which occur and cannot be adequately addressed by the Licensing Officer or operator, a parent advisory board for the specific day care could be used as a resolution forum.
Recommendation	Retain policy as in policy manual.
Additional Comment	Information about Section 7's should be made available to parents on request and explained in the parents' handbook.

Section 1 (Regulation)

Subject	**Sales of Day Care Centres**
Reference	Act - N/A Regulation - s.1(e) Draft Policy Manual: DL-02-01-04
Policy	Recommendation of 3 months notice of sales of centres, issuance of new licenses when centres are sold and the license holder changes, and requirement of service plan for new license holders. Policy specifying that the program director's duties cannot be strictly administrative nor strictly child care.
Discussion	The Committee carefully considered the necessity of as much as three months lead time prior to the sale of a D.C.C. and agree that three months seems too long. The Department should facilitate the sale process and not hinder it in any way. Discussion regarding the need for a new service plan was strongly supported especially the need for such a plan when a centre is newly owned, since the service plan is fundamental to the overall operation. Criminal record checks for new owners were also strongly supported.
Recommendation	Change the requirement to a guideline recommending three months notice (whenever possible) and a minimum of one month notice.

Section 5 (Regulation)

Subject	**Service Plan**
Reference	Act - N/A Regulation - s.5(1) and s.6(1) Draft Policy Manual: DL-02-06-01
Policy	Policy specifying contents of the service plan. Any changes to information included in Service Plan must be identified at license renewal.
Discussion	When reviewing this section, the Committee noted the importance of a service plan and as a result provide additional comments as discussed in Chapter 3. Notwithstanding these additional comments, the following must be addressed by both the Department and the day care industry. 1. Since many aspects of a D.C.C.'s operation (and, therefore, policy) relate to the service plan, it is a fundamental foundation and essential for good operating practices. 2. Condensed service plans would be an invaluable tool for parents when comparing D.C.C.'s. The service plan should be incorporated in the parents' handbook for their respective day care centre. 3. The Committee felt that all D.C.C.'s should have a service plan with those D.C.C.'s that are grandfathered being given a reasonable period of time to comply.
Recommendation	All D.C.C.'s should have a comprehensive service plan. Those that don't, due to grandfathering, should be given a reasonable time (i.e. to next license renewal) to provide a full service plan.
Additional Comment	Clarify wording about updating service plans explaining that an update is only needed for major changes in service.

Section 5 (Regulation)

Subject	**Criminal Record Checks**
Reference	Act N/A, Regulation N/A Draft Policy Manual: DL-02-05-01 DL-02-01-04
Policy	In order to ensure the safety and well being of children, day care centres shall implement a process of criminal record checks of child care personnel *prior* to their employment. All D.C.C.'s are required to provide *evidence* of criminal record checks. When a day care centre is sold to a new company a criminal record check on the purchaser(s) must be provided as part of the application for a new license.
Discussion	Committee members expressed their concern about having staff working in D.C.C.s who have criminal records and felt that people with a criminal past should not work with children. In particular, a concern was expressed about such criminal activities as pedophilia, since persons with such a criminal record should *never* be allowed to work with children. While the Committee recognizes that society accepts if a person has served his/her time or been pardoned, this should not have a bearing on his/her being hired. While this may be consistent with normal labour practices, average parents would be gravely concerned about having their children under such care. From a parent's perspective and to offer some comfort, D.C.C.'s should do criminal record checks before hiring staff. Discussion and further research indicated that a person who is pardoned will not show a criminal record (all records are wiped clean when a person is pardoned).
Recommendation	As a result of this discussion, the Committee recommends retaining the criminal record checking policy as stated in the manual.
Additional Comment	The committee would like to see the following sentence from the Appendices put in the policy manual. "Should an applicant be unwilling to undergo a criminal record check, or fail to return to the employer/agency with the completed documents, no further consideration to the job application *should* be given."

Section 6 (Regulation)

Subject	**Fire and Health Approvals**
Reference	Act - N/A Regulation - N/A Draft Policy Manual: DL-02-06-01
Policy	Fire and health inspections were required as part of the license renewal - which was dictating when those inspections occurred. This was disruptive to other Departments. The license should not be held up because of waiting for other approving authorities. Removal from Regulation of written confirmation of fire and health approval in license renewal application.
Discussion	Since fire and health approvals are determined by other levels of government written confirmation is not required for the day care license renewal application. The Committee recommends retaining the policy as written in the draft policy manual. It was further decided that fire evacuation procedures be included in the parents' handbook.

Recommendation	Retain policy as in policy manual, clarify wording.
Additional Comment	Policy should require that fire evacuation procedures be included in the parents' handbook.

Section 10 (Regulation)

Subject	**Kitchen Supervision**
Reference	Act - N/A Regulation - s.10(a)(ii) Draft Policy Manual: DL-02-10-02
Policy	Guideline that no more than 5 children be allowed in the kitchen at one time and under the supervision of primary staff.
Discussion	The Committee agree that the kitchen is an important functional area and children love being in the kitchen and "helping" with cooking. This is important for all children in day care who enjoy baking activities, yet the local facility layout often is the most important aspect to ensure the safety of children in the kitchen. Other areas of a D.C.C. were explored as to the feasibility of use for cooking, to keep the children away from the hazards of the kitchen. The lack of appropriate cleanliness (i.e. clean surfaces for rolling cookies) would make this unsuitable. The Committee feel that the staff:child ratios are the important aspect of kitchen activities for children and recommend no more than six children at one time.
Recommendation	Reword guideline stating that no more than 6 children be allowed in the kitchen at one time.

Section 11 (Regulation)

Subject	**Measurement of Net Floor Area**
Reference	Act N/A Regulation - s.11 Draft Policy Manual: DL-02-11-01
Policy	Policy specifying the areas that are excluded from measurement of the net floor area in centres licensed after November 30, 1990, (hallways, washrooms, kitchen, stairwells, office, lockers, storage and staff room).
Discussion	This policy specifies the areas which are excluded from day care centre's net floor area calculation. This policy has a grandfather effect as it only applies to centres licensed after November 30, 1990. During dialogue on this policy, the Committee decided that the application of the policy should not force a centre to reduce capacity. The Committee also endorsed that hallways, washrooms, kitchens, stairwells, office, lockers, storage and staff room not be calculated in net floor area. The Committee felt that increased area per child was a good idea and realized the day care industry will meet the new standard given time. As a result, the Committee supports retaining the policy as outlined in the draft policy manual. The Committee also recommends that the m^2/child ratio for each D.C.C. be included in the parents' handbook.
Recommendation	Retain policy as is.
Additional Comment	The number of m^2 per child (maximum capacity) should be provided in the parents' handbook.

Section 12 (Regulation)

Subject	**Furnishings and Equipment**
Reference	Act - N/A Regulation - s.12 Draft Policy Manual: DL-02-12-01
Policy	Requirement for inventory of toys and equipment for initial license applicants and license renewals. Specifies minimum requirements for indoor/outdoor play materials and equipment in order to define "sufficient quantity and variety." To ensure the health and safety of the children during sand and water play, license holders will work closely with the local Public Health Inspector to ensure proper procedures are followed in setting up and maintaining sand and water play areas.
Discussion	The Committee was impressed by the extensive list of furnishings and equipment required for a D.C.C. Parents do not want their children to be shortchanged in the variety and range of available toys and do not see the policy in any way causes a restriction on the range of toys. The Committee also commented on the usefulness of the inventory list to help D.C.C.'s and Licensing Officers keep abreast of equipment and furnishings. Concern was expressed about the recall of faulty equipment or furnishings that may be used in D.C.C.'s and question how the recall process works for the day care industry. Information provided to the Committee indicated that recall information would go from Consumer and Corporate Affairs to each D.C.C. Discussion of sand boxes indicated they can be very unhygienic and that they must be covered. Specific wording changes follow this page.

Recommendation	Retain policy with some refinements (see following page).
Additional Comment	The Committee want to satisfy themselves that "recalls" information on defective equipment is provided to each D.C.C.

DAY CARE PARENT WORKING ADVISORY COMMITTEE

Equipment
Section 12
Refinements to Policy

Policy (manual page)	**Refinement**
Use of Sand and Water Play Areas (162)	Remove following "i.e. certain practices are not acceptable such as throwing sand at other children or dumping water out." Remove following "In these activity areas primary staff members should model appropriate play behavior for the children."
Use of Sand and Play Water Areas (170)	As above.
Outdoor Equipment (173)	Clarify the word "screening" or say "form of screening."
Chair and table size (148)	Freestanding benches are not acceptable.
High chairs (148)	CSA approved high chairs shall be used with a wide base...

Section 14 (Regulation)

Subject	**Meeting Children's Developmental Needs**
Reference	Act - N/A Regulation - s.14(1) Draft Policy Manual: DL-02-14-01 DL-02-14-10
Policy	Policy describing children's developmental needs and how they are met in group care.
Discussion	This area was considered extremely important by the Committee and except for the refinements outlines on the following page, the policy was endorsed. As noted in the attachment, the term "one" primary staff is unrealistic or unnecessary as children should be comfortable with a number of caregivers.
Recommendation	Retain policy with some refinements (see following page).

DAY CARE PARENT WORKING ADVISORY COMMITTEE

Meeting Childrens' Developmental Needs
Section 14
Refinements to Policy

Policy (manual page)	**Refinement**
Introduction (193)	Only the first sentence should remain, i.e., "Play is a central and necessary part of children's development… balance of this text is removed. resumes at… The program shall: Remove references to "one consistent primary staff" so that it reads "consistent primary staff."
Definition "Emotional Needs" (203)	Change "the" primary staff member to "a" primary staff member.
Programs for Infants and Toddlers (205)	Remove "one" from consistent primary staff.
Bonding (206)	Remove "one" and put "a." Remove "the" from primary staff member.
Methods of Grouping Children…(207)	Second to last sentence to read "Consistent primary staff are essential in meeting the developmental needs of children." Last sentence removed.
Guideline (208)	Propose that a guideline say… "Children should be in a consistent group."

Section 15 (Regulation)

Subject	**Discipline**
Reference	Act - N/A Regulation - s.15 Draft Policy Manual: DL-02-15-01
Policy	Each facility shall have a written discipline policy, staff shall be made aware of the policy and the discipline policy shall be followed at all times.
Discussion	The Committee supports the fundamentals of the discipline policy, yet reflected on their experience of discipline as children which was usually more "punishment" oriented and often accompanied with a slap. This is not appropriate today, and certainly not when done by someone other than a parent. The concept of corporal punishment was discussed and it was noted that such punishment is not specifically excluded in the policy. The Committee felt that this is an oversight - one so important that it should be mentioned.
Recommendation	The Committee supports the entire policy and further recommends the specific exclusion of corporal punishment being used in D.C.C.'s.
Additional Comment	The definition of corporal punishment be put in the policy and the list of prohibited punishments include "biting."

Section 19 (Regulation)

Subject	**Accident or Illness**
Reference	Act - N/A Regulation - s.19 Draft Policy Manual: DL-02-19-01
Policy	Notification of parents in event of accident or serious illness and maintenance of "accident report" form or book.
Discussion	This policy deals with notifying parents in the event of an accident or serious illness. It also involves maintaining an "accident report" form or book. During discussions on this policy, the concept of an "incident," i.e., an occurrence that may have a traumatic or unknown effect, was considered important to the Committee. Also, day care operators should be required to keep written records to ensure that information is not misplaced and to identify "patterns" of development around specific incidents. The Committee recommended retaining the policy with the following additions. The word incident be added to wherever the word accident is used and the "written record" guideline be upgraded to policy.
Recommendation	Retain policy as is.
Additional Comment	The word incident is added when the word accident is used i.e., "accident/incident." The guideline regarding "written record" p. 219 should be made a policy.

Section 22 (Regulation)

Subject	**Medication/Administration Storage**
Reference	Act - N/A Regulation - s.22 Draft Policy Manual: DL-02-22-01
Policy	Medication administration, parent medication authorization and storage.
Discussion	The Committee discussed the need for all primary staff to have an updated first aid certificate, and indicated this should be policy and only such staff be authorized to administer medications (prescription and/or patent medicine). Particular concern was expressed about a "first dose" being administered at the D.C.C. and questions on the appropriateness of this were raised. Discussion indicated a first dose would very seldom be administered at a D.C.C. and if staff have First Aid Training then any reaction would be treated appropriately. The Committee felt that emergency medications should be inaccessible to children but should not be locked in case of a critical/emergent need for access to a "locked" box.
Recommendation	Amend the regulation to allow for medication for emergency situations to be stored inaccessible to children, but not locked.
Additional Comment	The guideline regarding persons administering medications being designated and having a valid first aid certificate, (p 228) should become a policy. This section of the Regulation should also cross reference to Staff Training and the First Aid training requirements, Section 41.

Section 24 (Regulation)

Subject	**Smoking Restrictions**
Reference	Act - N/A Regulation - s.24 Draft Policy Manual: DL-02-24-01
Policy	To ensure that children are not exposed to the health risks associated with second hand smoke.
Discussion	This policy is extremely obvious to any parent; children must not be exposed to the health risks associated with second hand smoke. The draft policy manual recommends as a guideline that primary staff not smoke when caring for children off-premises. The Committee insists this be changed to policy and be stated as follows: No person in care of children shall be allowed to smoke whether the children are on the day care premises or off-site.
Recommendation	Change the guideline (p. 233) Section 24(1) to a policy and add the policy that reads "Smoking is prohibited whenever primary staff are engaged in caring for children off the premises."

Section 25 (Regulation)

Subject	**Meals and Snacks**
Reference	Act - N/A Regulation - s.25 - 27 Draft Policy Manual: DL-02-25-01
Policy	Policy specifies the use of the Day Care Nutrition and Food Service Manual to assess compliance to nutritional standards.
Discussion	Discussion about the Day Care Food Service and Nutrition Manual (Nutrition Manual) indicated that while it is a useful source of information and has lots of good ideas, it is far too directive in its expectations of operators. The Committee acknowledged the importance of good diet and recognized that diets with high salt, sugar and fat are not good for children, yet feel that making such absolute restrictions proposed in the Nutrition Manual is not appropriate for the number of meals that are eaten by children when at day care. Children must be provided with the right choices of food, yet government should not be imposing such a "big brother" approach to meals, and the Committee is confident that the Canada Food Guide is adequate.
Recommendation	Do not use the Day Care Nutrition and Food Service Manual as the basis of policy, use Canada's Food Guide.
Additional Comment	As per following page.

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Meals and Snacks
Section 25
Refinements to Policy

Policy (manual page)	**Refinement (underlined)**
Provision of Meals and Snacks (235)	Remove all references to the Day Care Nutrition and Food Service Manual in the third paragraph.
Food Provided by Parent (236)	Where the food provided by the parent is inappropriate the D.C.C. will supplement with appropriate food. This is not within the responsibility of the Licensing Officer to monitor. This is a responsibility between the operator and the parent.
Nutritional Standards (237 - 239)	Remove all references to Manual and replace with Canada's Food Guide.
Appropriate times and sufficient quantities (238)	Children in care 4-6 hours ... one serving from 2 or more groups, including at least two servings from the milk or milk products group.
(239)	Children in care more than 6 hours shall receive one meal and 2 snacks including at least two servings from the milk or milk products group.
(239)	delete "sufficient quantities ... " add "sufficient quantities of food be available for children and that extra servings be made available until the child's appetite is satisfied."
(239)	delete children over 13 months text and first sentence of "infants under 13 months..."

Section 26 (Regulation)

Subject	**Menus**
Reference	Act - N/A Regulation - s.25 - 27 Draft Policy Manual: DL-02-26-02
Policy	To ensure that menus are developed weekly and posted so that staff and parents are aware of the weekly food plan. In nursery schools a record should be kept of all food served whether provided by parents or the nursery school.
Discussion	If parents bring food into a day care for other children, (i.e.. birthday cake), the Committee wants the day care operators to record this information. This policy should be revised through removing the reference to specific foods in Section 26(a) and (b). Section 26(c) requires rewording as follows: "...any food brought in by parents for general distribution to children other than their own will be recorded." This policy ensures that menus are developed weekly and posted as a communication method for staff and parents. Nursery schools must keep a record of all food served whether provided by parents or the operator. The Committee was apprised of enforcement orders (Section 7) for day care operators substituting foods not on the posted weekly menu. The example quoted was substituting carrot sticks for cauliflower segments. As a result of the discussion, the parents felt that specific ingredients do not need to be included on the menu. For example, a beef stew description does not require the types of vegetables in the stew.
Recommendation	Remove the reference to listing specific foods in Section 26(a) and (b). Re-word intent and policy for Section 26(c) so that the intent reflects "any food brought in by parents for general distribution to children in addition to their own will be recorded, for D.C.C.'s and Nursery Schools."
Additional Comment	As per the following page.

DAY CARE PARENTS WORKING ADVISORY COMMITTEE

Menus
Section 26
Refinements to Policy

Policy (manual page)	**Refinement**
Specific Foods (240 & 242)	Delete this paragraph.
Comment (241)	Delete current text, add reference to the Day Care Nutrition and Food Services Manual is recommended to operators for assistance in meal planning.

Section 28 (Regulation)

Subject	**Records**
Reference	Act - N/A Regulation - s.28 Draft Policy Manual: DL-02-28-01
Policy	Policy regarding the maintenance of records for all activities in the D.C.C.
Discussion	The Committee agrees that the policy on Records is comprehensive and very necessary. The only concern was that the definition of parent could include a "designate." The Committee recognizes that staff have to sign in and out at break time. This is very cumbersome, yet necessary to keep staff:child ratios. Since breaks are so short, the Committee felt that this policy is too restrictive. There was considerable discussion on the importance of having all children who attend day care immunized in accordance with public health standards, otherwise infectious disease could be spread throughout all children who attend. Having appropriate confirmation of immunizations is very important. As background to this policy, the Committee was provided with documents prepared by Day Care Programs on infectious diseases. Members felt all parents of children in day care should have this booklet. Hence, a recommendation that the parents' handbook list all pertinent information booklets and brochures available to parents and from where they may be obtained.
Recommendation	Retain policy except delete requirement for staff to sign in and out for breaks (p. 259).
Additional Comment	Include "parent/designate."

Section 29 (Regulation)

Subject	**Portable Emergency Information Record**
Reference	Act - N/A Regulation - s.29 Draft Policy Manual: DL-02-29-01
Policy	Regulation and policy specifying the contents of portable emergency file to be taken when children are off the facility premises.
Discussion	A portable emergency file must accompany the primary caregiver when children are off the day care premises. The file requirements are outlined in Section 28. The Committee recommended retaining the policy with the addition of including information on "medications taken on a regular basis."
Recommendation	Retain policy, add "medications taken on a regular basis" to the list of written confirmation of the child's immunization and other health information...(p. 264)

Section 30 (Regulation)

Subject	**Qualification Certificates**
Reference	Act - N/A Regulation - s.30(5) Draft Policy Manual: DL-02-30-03
Policy	Outlines the policy regarding the three levels of qualification and equivalencies. Regulation requirements for five years of work experience for equivalency to program director certification.
Discussion	The importance of having adequately qualified staff working in D.C.C.'s was supported by the Committee who pointed out that after the security of their children, qualified staff to care for their children was the next most important. As specific qualifications were reviewed, the Level 1 orientation class was cause for concern since there is no pass/fail for the course - it is an audit course only. This could allow staff to be qualified through their attendance alone. The Committee feels that there should be a skill assessment at the end of the Level 1 orientation course. As parents, the Committee looks forward to seeing day care workers as a respected profession. This will not only benefit the children, but it will also benefit the industry.
Recommendation	Retain policy.
Additional Comment	The orientation course (Level 1) should have a formal assessment component to ensure a thorough knowledge of the material, as defined by the appropriate and responsible departments of government.

Section 34 (Regulation)

Subject	**Staff Training Standards**
Reference	Act - N/A Regulation - s.34, s.39 Draft Policy Manual: DL-02-34-01
Policy	Cover-off or relief staff must have the same level of training as staff they are replacing in order for staffing training requirements to be met. Regulation requirement that those staff requiring Level 1 certification have Level 1 by September 1992.
Discussion	The intent of this policy is that relief staff must have the same level of training as staff they are replacing. During the dialogue on this policy, the Committee felt some flexibility should be offered to the day care industry. It was suggested that staff substitution with lower level certification would be acceptable for short time periods including lunch breaks.
Recommendation	Recommend that the policy state the following: "A primary staff member can be substituted with, at minimum, a level 1 staff for no more than a 15 minute period at one time with the exception of a lunch break."

Section 35 (Regulation)

Subject — **Ratios and Maximum Group Numbers**

Reference

Act - N/A
Regulation - s.35
Draft Policy Manual: DL-02-35

Policy

The intent of this section is to provide adequate supervision for children throughout the day, and to define the maximum size of group in which children can be placed.

Discussion

The Committee felt that the policy on ratios and maximum group sizes is very comprehensive and necessary to the operation of a D.C.C. Considerable discussion about ratios indicated that a centre should never be allowed to be out of ratio and the Committee supports the enforcement of such ratios, otherwise children could be at risk. The question of increased costs due to ratios was raised, yet the Committee believes that parents will be willing to pay any fee increases if the safety and security of children are at issue.

License Officer training should be very specific about interpretation of this policy so that strict adherence to the policy is kept at all times.

Grouping of similar age children, i.e. toddlers and 3 year olds, is acceptable providing that the service plan details how the grouping is achieved. However, the Committee does not support global ratios as an approach to grouping children.

The Committee did not have a problem with relaxed ratios during the children's sleep time. However, sufficient (full ratio) capable staff should be on-site if there is an emergency. The children will need all staff (full ratio) available in the day care should the children become confused or panicked.

The Committee realizes this could cause staffing problems, i.e. scheduling, however this requirement is in the best interests of the children. The Committee further agreed that during sleep time full ratio could be met through ancillary staff, i.e. secretary, cook. The details for emergencies during sleep time must be identified in the Service Plan.

As a further note, the cross reference between this section and section 40 (Adequate Supervision) should be clearly identified.

This subject further raised the importance of a D.C.C. having an emergency evacuation plan (as required in the service plan) and that this be provided as information to the parents, i.e. in the parents' handbook.

The area of adequate supervision while children are being transported in a vehicle caused the Committee to recommend that the driver should not be included in the staff:child ratio when there are four or more children in the vehicle.

Recommendation

The Committee supports the relaxed ratios for sleep time with the provision that full ratio staff remain on site at that time.

Drivers should not be included in staff:child ratio when there are four or more children in the vehicle.

Additional Comment

See attached.

DAY CARE PARENT WORKING ADVISORY COMMITTEE

Staff:Child Ratios
Section 35
Refinements to Policy

Policy (manual page)	Refinement
Consistency of primary staff members (282)	The committee commended that "the same group with the same primary staff members every day" is good yet may be too restricting. It is also beneficial for children to have a change of staff. The service plan should reflect the changing of staff to accommodate more flexibility and opportunity for variety.
Ineligible for inclusion (282)	Drivers should not be included in the staff:child ratio when there are four or more children in the vehicle.
Maximum group size (285)	The second paragraph is too verbose. Suggest using a word other than "group" when talking about groups of children i.e., class, since the word group has a number of formal and informal meanings.
Consistent primary staff member (289)	Use the words "consistent primary staff members who are always responsible for them". This allows some flexibility for operators and change for children.
Physical space/open environment (292)	The 2nd and 3rd paragraph are too long and repeat themselves. This should be brief since the manual is for enforcement purposes.
Sleep/Activities designated by the Director (296)	Add the policy that during "Activities designated" or during sleep times full ratio staff must still be on site and available in case of an emergency situation. Policy should also specify that these activities be presented on site to qualify for the reduced ratios.
Mixed age groups (298)	A service plan must outline the mixed age groups. Recommend that all D.C.C.'s have an up-to-date service plan. See Section 5.
Mixed age groups (299)	Remove first paragraph "Consistency of contacts..." This seems inappropriately placed here.

Section 37 (Regulation)

Subject	**Drop-in Centre Staff:Child Ratios**
Reference	Act - N/A Regulation - s.37 Draft Policy Manual: DL-02-37
Policy	To ensure adequate supervision for children in part-time or casual care.
Discussion	This policy ensures adequate supervision for children in part-time or casual care. Representatives of the Day Care Program indicated there is only one drop-in centre in Alberta; however, there are day cares which offer drop-in services on a reservation or first-come, first-serve basis. The Committee supported the proposed policy but did not fully appreciate why there is a difference in ratios between a regular day care and a drop-in centre. In emergency situations, it would be beneficial to have adequate staff for evacuation purposes.
Recommendation	Retain policy.
Additional Comment	The policy manual should spell out the importance of having adequate staff for evacuation purposes.

Section 39 (Regulation)

Subject	**Staff Qualification Exemptions**
Reference	Act - N/A Regulation - s.39 Draft Policy Manual: DL-02-39-01
Policy	**21.4** Regulation and policy allowing for exemptions from staff qualifications requirement if reasonable efforts have been made to find suitable staff and if staff hired are engaged in necessary course work.
Discussion	While the Committee strongly supports the importance of qualified staff, they realize that this policy does allow some latitude, especially for rural areas, in allowing qualification exemptions. As the industry introduces better qualified staff, hopefully this policy will not be needed in the future.
Recommendation	Retain policy as is.

Section 40 (Regulation)

Subject	**Adequate Supervision**
Reference	Act N/A Regulation - s.40 Draft Policy Manual: DL-02-40-01
Policy	Requires that children be adequately supervised at all times to ensure their health and safety.
Discussion	The Committee was extremely concerned with this issue; emergency evacuations being the example. As a result, the Committee decided that awake or full staff:child ratios should be on-site at all times. The Committee realized that this policy refinement could force a day care to hire additional staff. The additional costs are worth the safety benefits gained. However, the Committee agreed that during sleep time full ratio could be met through ancillary staff, i.e. secretary, cook. The details for emergencies during sleep time must be identified in the Service Plan.
Recommendation	This section should be absolutely explicit especially about having staff "on site" at all times for evacuation purposes. Reference to Section 38(1) should be spelled out.

Section 41 (Regulation)

Subject	**First Aid Staffing**
Reference	Draft Policy Manual: DL-02-41
Policy	To ensure that staff trained in first aid are immediately available in case of emergency.
Discussion	The Committee felt that first aid training is a very important part of a D.C.C. operation, since a fundamental concern is for the health and safety of the children. The Committee, therefore, wants to see a number of staff have a first aid qualification rather than just one staff at any one time. Therefore, the guidelines in the manual should be upgraded to a policy.
Recommendation	Make the guidelines into policy. All staff with Level 2 and 3 qualification should also have a valid first aid certificate.

3.0 CONCLUSIONS

As the review of the policy manual proceeded there were a number of themes that recurred throughout the discussions. These were duly noted and are reported here in the form of comments to the Minister.

3.1 Service Plans

The policy manual provides a comprehensive description of what a service plan should include in Section 5 of the Regulation and the Committee are pleased with its inclusion in Regulation and policy, and acknowledge service plans as a fundamental foundation to all aspects of operation.

It is with this acknowledgement in mind the Committee recommends that all day care centres should have a full service plan, no matter when they were licensed. The policy manual makes reference to the service plan as a baseline document in many instances of policy interpretation. It is, therefore, important to have a service plan as a blueprint for operations. If all centres had a service plan in place then there would be a "level playing field" throughout the Province, in particular for parents to choose a day care centre.

3.2 Level 1 Qualification

The Committee expressed their support for the introduction of the Level 1 Qualification, the 50 hour orientation course, as a minimum qualification for all day care centre staff.

The Committee inquired into the competency testing for this level of qualification and were surprised to find that the course does not have a testing scheme. This indicates that staff could therefore comply with the Regulation and have taken the course, but may well have not learned anything since their level of competency at the end of the course is not measured.

The Committee believes this presents a weak link in the training chain, one that is an important link since many centres may depend on Level 1 staff for their major staffing

component (and still comply with the policy). This could be a particular problem if the staff person does not have a competency in English, yet instructions written in English may be necessary to the safe and healthy environment for children.

The Committee, therefore, recommends that the Level 1 course have an assessment test added to it to confirm that minimum skills have been attained.

3.3 Full Complement of Staff on Site

A fundamental tenet of the Regulation and policy is the safety and health of the children in care at a day care centre. Staff:child ratios are geared not only to the developmental needs of children, but also to the need for adults capable of initiating an orderly evacuation if the need arises. The policy at present allows for relaxed ratios at sleep time (Section 35(2)) and for adequate supervision (Section 40). Interpretation of these sections does allow the full staff:child ratio to slip and could put children at significant risk in a worst case scenario.

It is with this in mind that the Committee recommends that the staff for a full staff:child ratio should be on the premises at all times. Should this require that staff be paid even while taking their lunch break, the Committee feels that parents would willingly pay the dividend to ensure that adequate supervision is interpreted as full supervision at all times.

3.4 Information to Parents

In many instances the Committee felt that as parents they have a right to more and/or better information about their day care centre and about day care centres in general. In part, this request came about as the general level of knowledge and awareness was raised within individual Committee members as a function of the Committee's task. Although information has been made available to parents by the Department, Committee members felt the type of information provided to parents could be expanded. In a number of instances, reference was made to the need for a parents' handbook, as recommended in the service plan requirements for Section 5. This handbook should include:

- Synopsis of the Service Plan
- List of information resources available to parents, eg. the immunization booklet
- Fire evacuation procedure at that location
- Discipline
- A brief explanation of the complaint process and about how parents gain access to information about non-compliances.
- Area per child

Other instances of parents wanting to know about the day care centre include considerable discussion regarding the posting of a non-compliance incident in a prominent place so that parents can see the report when they come and go daily, although this did not become a recommendation. The Committee, therefore, recommend that when parents request information about non-compliances, a D.C.C. shall provide the information to parents but the D.C.C. not be required to post the information.

3.5 Parent Responsibilities

Along with the points raised in 3.4 regarding parents' need for adequate information, came the corollary of this; parents have a responsibility to monitor their chosen day care centre, since they are the consumer of the services.

The Committee feels parents must be encouraged toward greater involvement in monitoring their chosen day care centre. The whole responsibility should not be shouldered by the Department - it must be shared. An example of how this might be accomplished included having parent advisory boards for all day care centres.

3.6 Cost Implications

During the policy manual review, the cost implications of implementing specific policies was raised. The Committee was extremely cognizant of all policy changes which could have a financial impact on all day care operators and thus the consumers of the service.

Costs were examined in the form of information from the Program representatives and as an educated guess based on general knowledge about unit costs. Specific areas that may cause cost increases that were considered by the Committee are:

- Service Plans
- Adequate Supervision
- Staff:Child Ratios
- Staff Qualifications

After considerable discussion and debate, the Committee felt that every recommendation that was made to the Minister that had a cost implication is worth the cost. In fact, a specific quote "the cost does not change what I would do or change what policy I would recommend."

The Committee reflected on its mandate and its role as representing parents of children in day care centres in Alberta, and believes that the health, safety and happiness of Alberta's children is the primary concern of all parents followed closely by the continued availability of affordable and convenient day care spaces.